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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 97-267 MMC
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	REGARDING BRIEFING SCHEDULE FOR
v.)	DEFENDANT'S SPEEDY TRIAL MOTION
)	
KAMAL M. KADRI,)	
)	
Defendant.)	
)	

The defendant, KAMAL M. KADRI, represented by Alexandra McClure, and the government, represented by Rita F. Lin, Assistant United States Attorney, are currently scheduled to appear before the Court on October 21, 2015, for a hearing on two potential pretrial motions by the defendant. The defendant has determined that he will file only one of those two motions: specifically, a motion concerning his speedy trial rights. Currently, the defendant is scheduled to file that motion on September 2, 2015, with the government's opposition brief due on September 23, 2015, and the defendant's reply due on October 7, 2015.

The parties respectfully request to continue the briefing dates on the defendant's speedy trial motion. On August 25, 2015, the defendant requested additional discovery from the government in

connection with that motion. The government is in the process of searching for the requested documents, and will make every effort to have those documents available by September 11, 2015. Assuming the government will be able to obtain those documents by that date, the parties do not believe it will be necessary to change the current October 21, 2015 hearing date. However, the parties hereby stipulate and jointly request that the briefing dates be continued such that the defendant's speedy trial motion will be due on September 16, 2015, that the government's opposition will be due on September 30, 2015, and that the defendant's reply brief will be due on October 7, 2015. That will permit the defendant time to evaluate the discovery produced by the government in advance of filing his motion.

Dated: September 1, 2015

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

By: /s/ Rita F. Lin
RITA F. LIN
Assistant United States Attorney

By: /s/ Alexandra McClure
ALEXANDRA MCCLURE
Counsel for Defendant Kamal M. Kadri

~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED that the defendant's speedy trial motion will be due on September 16, 2015, that the government's opposition will be due on September 30, 2015, and that the defendant's reply brief will be due on October 7, 2015. The motion will remain scheduled for hearing on October 21, 2015 at 2:15 p.m.

DATED: September 2, 2015


HONORABLE MAXINE M. CHESNEY
United States District Court Judge